



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

June 28, 2022

BY ECF

The Honorable J. Paul Oetken
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

Re: United States v. Dalip Kumar, a/k/a "Dalip Vermani,"
21 Cr. 755 (JPO)

Dear Judge Oetken:

A status conference is scheduled in the above-captioned matter for July 6, 2022. The Government writes on behalf of the parties respectfully to request an adjournment of the conference for approximately 60 days. The Government has produced discovery and the adjournment is requested to permit defense counsel sufficient time to review the discovery materials and to advise the defendant regarding such materials. In addition, the undersigned will soon be leaving the U.S. Attorney's Office and the adjournment will allow sufficient time for new counsel for the Government to familiarize themselves with the case and resume discussions with the defense regarding possible pretrial disposition.

In the event that the Court grants the requested adjournment, the Government respectfully requests that the Court exclude time under the Speedy Trial Act, from July 6, 2022 until such date as the conference is rescheduled for the reasons stated above. The Government submits that the ends of justice served by the continuance outweigh the best interests of the public and the defendants in a speedy trial. *See* 18 U.S.C. § 3161(h)(7)(A).

I have communicated with defense counsel, Mr. Varghese, who consents to the adjournment and exclusion of time.

Respectfully submitted,

DAMIAN WILLIAMS
United States Attorney

By: 
Brett M. Kalikow
Assistant United States Attorney
(212) 637-2220

cc: Vinoo P. Varghese, Esq. (via ECF)